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ABSTRACT

The decision to establish equivalencies between vocational training diplomas in France and Germany is a legal act subject to publication in the official gazettes of both countries. The procedure for establishing the equivalence and forms of implementation is defined in arrangements adopted by the committee of Franco-German experts in application of the 1977 agreement between the two countries. Since 1987, the cumbersome procedure has been replaced by a system that examines all diplomas in an occupational field. The new system has led to only very partial improvements. The committee of experts have undertaken a joint discussion aimed at developing a new more flexible and operational procedure, based on the transparency and comparability of diplomas. A work group of experts has adopted a method that follows the decision to accompany each new German diploma with a one-page descriptive note translated into English and French. The description includes these five headings: vocational title, length of training program, occupational target, occupational competencies acquired, and date of diploma creation. A comparison of the first descriptions prepared in the hotel management-catering field show that common references in the two countries guarantee the quality of the information produced. (YLB)

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FROM EQUIVALENCE TO TRANSPARENCY OF VOCATIONAL DIPLOMAS
The Case of France and Germany

The improvement of labour-force mobility within the European Union depends on the prior mutual recognition of the diplomas issued in each of the Member States.[1] At European level, there have been genuine advances in this area concerning qualifications necessary for the exercise of the so-called 'regulated' occupations and for diplomas granted after a minimum period of three years of higher education.[2] By contrast, efforts for mutual recognition of vocational diplomas at secondary and post-secondary levels have yielded more modest results, which may be explained by the diversity of the forms of access to the corresponding qualifications and jobs owing to their lesser degree of regulation. If a general system of recognition of vocational diplomas was thus adopted by a European Directive in 1992, the Member States are nonetheless called upon to ensure the transparency of these qualifications. In parallel to the European Commission's initiatives, France and Germany have gradually set up a system for mutual information and exchanges aimed at the equivalence or recognition of their vocational diplomas. This bilateral mechanism, which has taken into account the advances achieved at European level as it evolves, is a fruitful source of first-hand experience.

HISTORICAL AND INSTITUTIONAL CONTEXT OF FRANCO-GERMAN RELATIONS

The equivalence of vocational training diplomas, which was adopted by a 1977 Agreement between the German and French governments, comes under the framework of the bilateral co-operation initiatives resulting from the Treaty signed by Charles de Gaulle and Konrad Adenauer in 1963.

The general action programme covering the equivalence procedure has as its objectives:[3]
- facilitating the labour-market entry of young people and adults in both the partner country and the country of origin;
- raising the level of qualifications among young people and adults in the two countries;
- meeting the needs of the employment system through technical education and vocational training;
- developping linkages between the education and training systems on the one hand and the work environment of the company on the other.

This programme initially included three main actions:
- exchanges among young people and adults (students, apprentices, teachers, trainers, etc.) and the carrying out of joint educational projects;
- the exchange of information on the development of the two partners' policies on technological education and vocational training through seminars, field trips and meetings between those in charge;
- the determination of equivalencies for technical education and vocational training diplomas.

The definition and follow-up of these actions are entrusted to a Franco-German committee of experts placed under

1. An earlier version of this text was presented at the Qualitrans workshop, "European Experiences in the Mutual Recognition of Qualifications", Barcelona, 26-27 February 1999.
2. The 'regulated' occupations involve mainly health professionals and architects.
3. Programme defined by the bilateral agreement of 27 October 1986.

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the supervision of the Ministry of Education in France and the Plenipotentiary for Cultural Affairs in Germany.[4]

EQUIVALENCE OF DIPLOMAS

The decision to establish equivalencies between vocational training diplomas is a legal act subject to publication in the official gazettes of the two countries. The procedure for establishing the equivalence and the forms of implementation are defined in arrangements adopted by the committee of Franco-German experts in application of the 1977 agreement.

The diplomas involved are those whose preparation (training content) and certification are regulated by the State.[5] They should correspond to significant flows of trainees and future-oriented training streams and be situated at a comparable technological level. They should also be likely to favour individual mobility between the two countries.

The examination that precedes the establishment of the equivalence is based on the analysis of the diploma standards: the minimum programme required, the subjects and forms of examination; the overall programme and contents of preparatory training and, if necessary, the academic origin of the students enrolled in the programme (level, stream) and the length of training.

A permanent group, set up by the committee and composed of experts from the two countries, is responsible for selecting the diplomas likely to be placed in equivalence and supervise the preparation of the dossiers necessary for the prior examination. These dossiers–translated if possible–are transmitted to the partner country for an initial examination.

Once the feasibility of the equivalence is established, a second group of experts, specialised in the field under consideration, undertake a detailed comparison examination of the dossiers. Its conclusions are transmitted to the committee, which draws up a recommendation addressed to the two governments in anticipation of the official publication of the equivalence in their gazettes.

The permanent group is also responsible for making sure that any changes in the training programmes or the diplomas associated with them are communicated to each of the two parties.

RESERVATIONS CONCERNING EQUIVALENCE

Procedural entanglements

The different steps of this relatively long and complex procedure are justified in view of the legal status of the equivalence, which grants rights in terms of recognition of qualification to the partner country's diploma.

Notwithstanding the considerable stakes of equivalence, the procedure adopted to bring it about quickly turned out to be difficult to handle because of its cumbersomeness. In 1987, as the mechanism bogged down, several experts proposed that the detailed diploma-by-diploma examination be abandoned in favour of a broader framework, that of the occupational field, such as, for example, the whole of the diplomas in metallurgy.

This new system led however to only very partial improvements.[6]

- For one thing, the definition of the occupational fields is not the same in the two countries. Thus, when chemistry diplomas were examined, a certain number of French training programmes had to be eliminated (rubber, laboratory, biochemistry) because they were excluded from the German occupational field.
- For another, experts from the two countries did not always agree on proposing equivalence where there was an only strong presumption of similarity.

Thus, the new formula has neither simplified the procedure nor improved its efficiency. At present, equivalence has been declared for slightly under thirty vocational training diplomas.

Limited Scope

The very principle of equivalence has been called into question for various reasons. The impact of the equivalence of vocational diplomas relative to the goal of cross-border mobility has not been able to be established by the different studies carried out on both sides of the Rhine particularly because of its relatively private nature : indeed, very few people are informed of the existence of such a mechanism.

As of 1993, the Franco-German experts drew attention to the gap between this process and the new orientations adopted at European level for pre-university-level diplomas and non-regulated occupations.These orientations, based on the principles of free circulation within the European labour market and mutual confidence in the quality of the training systems, move away from an approach of strict correspondence of diplomas and qualifications in favour of the creation of systems of information aimed at improving the transparency of diplomas and qualifications for the use of companies and the workforce.

A final complication stems from the fact that the world of vocational diplomas has changed considerably since the adoption of the Franco-German agreement on equivalence, especially in France. For one thing, the rhythm of elimination/creation of diplomas has accelerated, which threatens to make the determination of equivalence obsolete and further accentuates the slowness of the procedure. For another, the creation of a new French diploma, the vocational *baccalauréat*, has somewhat complicated the process of expertise if not penalised the diplomas situated at a lower level (vocational aptitude and vocational studies certificates [CAP/BEP]).

4. Since education comes under the authority of each of the sixteen Länder in Germany, their collective representation rotates from one to another through a delegation of power.

5. In Germany, these are the certificates issued within the framework of the dual system (*Die anerkannten Ausbildungsberufe*) and in France, technical education diplomas issued by the Ministry of Education. At present, about 350 "Dual" certificates and some 700 French diplomas come under this procedure.

6. According to the conclusions of the French head of equivalences at the time.

It should also be noted that the prior expertise, essentially focused on the detailed examination of training guidelines (content, tests), did not sufficiently take into account the features of the publics admitted into these training programmes (the prior schooling path), or the work activities targeted by the diploma (acquisition of skills) or even the impact of the diplomas in terms of recognition of qualification, career prospects or possibilities for continued studies.

Several of these factors have led the committee of Franco-German experts to undertake a joint discussion aimed at developing a new procedure that would be more flexible and operational, based on the transparency and comparability of diplomas. The equivalence procedure has not been abandoned, however; it may be initiated whenever a formal correspondence between two diplomas is brought out during exchanges between experts from different specialisations. The maintaining of equivalence is defended by the members of the committee, who give it a symbolic value that, in their eyes, illustrates the exemplary nature of the co-operation between Germany and France.

TRANSPARENCY AND COMPARABILITY OF FRENCH AND GERMAN DIPLOMAS

The present direction of the work of the Franco-German experts is the fruit of the two delegations' efforts to arrive at mutual recognition of the diplomas. This new procedure was formalised in the joint declaration of the Plenipotentiary of the Federal Republic of Germany and the French Minister of Education during the Franco-German summit held in Weimar in September 1997.

According to this document, intended as a "complement" to the Franco-German agreement of 16 June 1977 on the equivalence of vocational training diplomas, "In view of a reciprocal comprehension of their vocational training systems and a mutual confidence in the quality of vocational certifications recognised in the partner country, Germany and France agree to arrive at a broad comparability of their vocational training diplomas with the help of multilingual certificates and job descriptions (training and work activity guidelines).

"The two parties have decided to create an index of the vocational training programmes of the different specialisations in the two countries by describing the targeted work activity and the competencies acquired. These descriptions should give rise to a documentation that will be published and continuously updated. This operation will draw on the work already carried out in the two countries.

"The two governments will present a joint initiative to the European Commission and the other partners of the European Union in order to implement as broadly as possible the measures necessary for the transparency and comparability of vocational training diplomas at European level".

Following the Weimar summit, a work group set up by the committee of experts was assigned to design the new procedure for the transparency of vocational training diplomas. The method adopted by the experts draws on a proposal put forth by the German delegation, based on the recent decision to accompany each new German diploma with a one-page descriptive note translated into English and French. This 'vocational profile', which is published in the official gazette, is intended to specify job candidates' professional abilities and competencies so that the potential employer can evaluate their qualification and, if need be, situate them in relation to the classifications grid in effect.

Once the general principle of such a description was accepted, a certain number of problems remained:
- The choice of a starting point: the qualifications (or occupations) targeted or existing certifications?
- The priority to be established for the procedure: developing an overall structure by broad occupational field, favouring the qualifications most relevant to mobility (cross-border activities, hotel management, tourism, etc.) or examining first of all the most important qualifications in terms of the numbers of trainees (office work, metallurgy, etc.)?
- The documents to be used in establishing the descriptions.

The experts from the two delegations adopted a gradual, pragmatic approach in their search for solutions. Thus, the initial idea of quickly developing a form of binational register covering all the vocational diplomas had to be partly abandoned. The primary goal of the operation is to arrive at documents that are meaningful and clear in order to encourage their utilisation by those for whom they have been created, namely private individuals and companies.

The work group's first meetings in early 1998 resulted in several advances in procedure:
- Each descriptive note is to refer to a diploma marking the successful completion of a vocational training programme (the educational system's diploma in France, the certificate obtained after apprenticeship in the dual system in Germany).
- The description includes five headings:
  - the vocational title
  - the length of the training programme (with a possible reference to the level of schooling required for entrance)
  - the occupational target: the kind of job without explicit mention of a precise level of qualification; the economic context in terms of product and kind of company; the technological context; the position within the organisation, indicating the diploma-holder's degree of autonomy
  - the occupational competencies acquired, following the broad lines of the objectives fixed by the diploma
  - the date the diploma was created
- Those who draw up the descriptions (for France, the educational system inspectors specialising in the occupational field, with the help of the National Office for Information on Educational Programmes and Occupations [ONISEP] and Céreq; for Germany, mainly experts from the Federal Institute for Vocational Training [BIBB]) meet together in order to co-ordinate them once

they have exchanged translations.
- These descriptions must subsequently be submitted to professionals in the field in order to test the relevance and clarity of their content.

INITIAL OBSERVATIONS

A comparison of the first descriptions prepared in the hotel management/catering field brought out the complexity of an exercise that attempts to reconcile transparency, precision, concision and, above all, the other partner's comprehension of the content of the different headings. Behind the problems of translating the terms used lies the more basic difficulty of reflecting a reality that covers all the interactions between educational system, vocational training, labour market and industrial relations.

The vocational title is a good indicator of these difficulties in translating across national realities. The German profiles refer to a trade while the French profiles use the title of the diploma (CAP, BEP, Bac Pro) accompanied by the field with which it is associated. These differences are not neutral, for they go back to the specific conception of vocational training diplomas in each of the two countries. Indeed, in the field of hotel management/catering, these are illustrated by the respective number of profiles to be described: at least thirteen French diplomas (from CAP to BTS[higher technician certificate]) as compared to four German diplomas.

In France, the vocational diploma is part of a hierarchically ordered system whose different stages are supposed to correspond not only to a level of training but also to a job level. The vocational diploma thus has two objectives: the school-to-work transition and the continuation of studies. Furthermore, this diploma does not correspond to a precise trade but is defined relative to an occupational field, as in the 'vocational *baccalauréat*-catering'. In Germany, by contrast, the diplomas issued in the dual system refer directly to a trade, which is defined as a structured, indivisible group of occupational competencies. Such diplomas are basically oriented towards the exercise of a work activity rather than the continuation of studies. There is thus a diploma title 'Professional employee in catering'.

These examples suggest that the totality of the vocational diplomas in a field should be taken into account in order to establish an overall perspective without necessarily deciding on the term-by-term comparability of each diploma.

The pragmatism of the approach should nonetheless allow the pitfalls encountered during earlier experiences to be avoided. Beyond the time required for the implementation of such an operation, however, its success depends on the fulfilment of a number of requirements, three of which appear to be essential: disposing of technical competencies specific to each occupational field, being able to enter into the logic of the neighbouring system and paying constant attention to the precision and clarity of the information generated.

It must be emphasised that the bilateral framework offers particular advantages which should not be underestimated were the experience to be transposed to the whole of the European countries. Indeed, France and Germany have a certain number of common references in terms of initial vocational training which the experts from these countries can use to establish solid interconnections. The general principles underlying the creation of vocational training diplomas are similar on both sides of the Rhine. The vocational diplomas selected are official titles recognised as standards throughout the country. They are based on an overall conception of the knowledge and capabilities acquired in an occupational field or a trade. Their guidelines (content standards, targeted competencies, forms of testing) are developed according to a similar procedure in committees composed of all the social players (public authorities, employer and employee representatives), even if the roles of these players differ from one country to the other. And these diplomas are often recognised in terms of classification in the collective agreements. These common references create a space for the definition of vocational profiles and constitute a source that guarantees the quality of the information produced.

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